

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA
Plaintiff,

v.

WILLIAM SANCHEZ VICENTE
Defendant.

CRIMINAL NO. 17-005 (ADC)

Be the person you needed when you were younger

- Ayesha Siddiqi

SENTENCING MEMORANDUM

Mr. Sanchez-Vicente knew what he was doing was wrong. He was quick to admit as much when he was arrested. To understand why Mr. Sanchez-Vicente committed this crime this Court should consider his actions in the context of his entire life. In doing so, it will be in a better position to enter a fair and just sentence. Ultimately, Mr. Sanchez-Vicente requests this Court accept the Plea Agreement he entered into with the government, and sentence him to twenty-four months in prison. (D.E. 42).

What is the opposite of a role model?

One of two children born in Santo Domingo, Dominican Republic, to Adela Vicente and Reynaldo Sanchez, Mr. Sanchez-Vicente had a difficult childhood. He is one of thirty-seven children born to Reynaldo Sanchez. Reynaldo, a bodyguard for President Joaquin Balaguer, appears to have made it a point to father as many children as possible. Needless to say, he was rarely around, did not provide financial or emotional support, and was far from an ideal role model.

His mother, Adela, took on the more important role of actually raising Mr. Sanchez-Vicente and his brother, Eddie. She bore all of the emotional and financial responsibilities of parenthood, and by all accounts was a great mother. She provided for him and Eddie as much as she could; they were always fed and clothed, and encouraged to excel at school.

His father was a different story. His job, as a bodyguard for Joaquin Balaguer, was a source of shame for Mr. Sanchez-Vicente and Eddie. As the years went on, they realized the role their father played in Dominican history. Protecting a political strongman; a man who held on to power, of and on, for over twenty-four years, who practiced repressive and brutal tactics against his people, a man who was a lifelong bachelor yet fathered countless children throughout the country. This was not someone Mr. Sanchez-Vicente wanted to emulate—yet that is what his father, Reynaldo, seemed to do.

Mr. Sanchez-Vicente and his brother often fantasized about changing their names—anything that would help disassociate them from their father; they were just kids letting off some steam. It would take decades for Mr. Sanchez-Vicente to realize the irony of his childhood fantasy. He was, however, determined to be different, to be better. He wanted to make his children proud and wanted to play a central role in the childhood.

After graduating high school in Azua, Dominican Republic, Mr. Sanchez-Vicente enrolled in the university. While there, he met his first serious girlfriend, Sonia Beltre. A few months into their relationship, Sonia became pregnant. Mr. Sanchez-Vicente was ecstatic and determined to be the father he never had. Barely able to support himself, he decided school would have to wait, and he came to the United States in search of better opportunities.

It all started with a lie

Mr. Sanchez-Vicente arrived in Puerto Rico in 1997. He worked odd jobs and eventually found more stable work in construction. He was getting by, but soon realized he would not succeed if he had to live, and work, in the shadows. In 2002, helped by an acquaintance, he paid for someone else's identification. His new name was Mario Marrero Gascot—and for the next fifteen years, that is what everyone called him.

With his new identity, Mr. Sanchez-Vicente built a new life for himself. He opened a business, obtained a driver's license, and paid his taxes. While he does not deny there were a few bumps along the way—namely a 2003 arrest in New York—overall he was a hardworking and productive member of his community.

Throughout his time in Puerto Rico he always provided for his son Daniel, 19,

and his aging mother. He suffers knowing he was not around to raise Daniel, but finds solace in knowing his financial support was essential in sending him to a great school. Daniel is now enrolled in the university. He is motivated and hardworking. Before his incarceration Mr. Sanchez-Vicente and him communicated daily, and when possible via FaceTime or Skype. Now, they speak weekly, and Mr. Sanchez-Vicente is hopeful of reuniting with him soon.

Mr. Sanchez-Vicente's mother has been sick for a few years, but toward the end of 2015 she got sicker. She suffers from gastritis and fibromyalgia and takes daily medication. It was her worsening condition that convinced him it was time to go back home. Still— and perhaps ironically— he had never used the passport he had purchased all those years before. He was always too afraid to use it. He went rummaging through his files looking for it. When he found it, he realized it had expired. He still knew the acquaintance that had sold it to him, so he reached out. He explained the situation and the acquaintance agreed to help. What he— and perhaps his acquaintance— did not know was that the real Mario Marrero Gascot had died a few years earlier. When the passport application was submitted red flags went off in the U.S. Citizenship and Immigration Services (USCIS) computer system. A sting operation was set up and Mr. Sanchez-Vicente was arrested. He now stands before this Court ready to accept responsibility and the consequences of his actions.

CONCLUSION

Mr. Sanchez-Vicente's life has been one of struggle, risk, and pain. He is not the first, and will not be the last, undocumented immigrant to work using someone else's identity to provide for his family. While his actions are inexcusable, they resulted from a sense of responsibility and love toward his son and mother— not from a desire to victimize anyone. He is ready to go home to be with his mother and son, and to start a new life—this time as himself.

Mr. Sanchez-Vicente respectfully requests this Court accept the Plea Agreement entered into by the parties, and sentence him 24 months in prison.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

At San Juan, Puerto Rico, this February 1, 2018.

ERIC A. VOS, ESQ.
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District of Puerto Rico

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